

## **DECLARATION OF MICHAEL KULAKOWSKI**

I, Michael Kulakowski, declare as follows:

1. I am over twenty-one years of age and am competent in all respects to give this Declaration. This Declaration is given freely and voluntarily. I have personal knowledge of the matters set forth in this Declaration and could, and would, testify competently thereto under penalty of perjury.
2. I currently am an employee of WestRock Services Inc. ("WestRock").
3. During my employment with WestRock, I worked in the Shipping Department in the Fulfillment Center in Gallatin, Tennessee.
4. The Fulfillment Center has both male and female employees.
5. I have observed the employees in the fulfillment center and I believe that there are at least 40% female employees.
6. Female employees are in roles such as forklift drivers, machine operators, team leads, production employees and other jobs.
7. I am currently on a forced medical leave and the employee who is performing my job in the shipping department is a female.

In accordance with 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

This the 23 day of February 2018.

  
Michael Kulakowski